

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	
Peter M. Kranack,)	Bankruptcy No.: 15-23309-JAD
Debtor)	
)	
)	Motion No.:
Ronda J. Winnecour, Chapter 13 Trustee,)	
Movant)	Document No.: 82
vs.)	
)	
)	
U.S. Bank Trust National Association,)	
As trustee for CVP III Mortgage Loan Trust II)	
Respondent)	

**DEBTOR'S RESPONSE TO TRUSTEE'S MOTION FOR DETERMINATION
MORTGAGE CREDITOR HAS BEEN PAID PER PLAN AND TO CONFIRM
DEBTOR RESUMPTION OF PAYMENTS**

1. Admitted. Answering further, the proof of claim filed by Carrington included as an attachment the original mortgage from PNC dated 06/04/2004 in the amount of \$27,306.00.
2. Admitted. Answering further, the proof of claim filed by Cerastes included as an attachment a Loan Modification Agreement from Selene Finance dated 01/09/2013 in the amount of \$31,708.22.
3. Admitted.
 - 3.2 Admitted.
4. Denied that there were no Notices of Postpetition Mortgage Fees, Expenses, and Charges (hereinafter "PPFN"). To the contrary a PPFN was filed on 02/05/2018, and another on 03/21/2018:
 - a. The PPFN filed on 02/05/2018 concerned a "school tax advance" incurred on 8/30/2017 in the amount of \$1,774.09.

- b. The PPFN filed on 03/21/2018 concerned an “insurance advance (non-escrow)” incurred on 01/09/2018 in the amount of \$610.00.
 - c. The Chapter 13 Trustee’s records indicate both items have been paid.
- 5. Admitted. Further answering, the Loan Modification Agreement from Selene Finance dated 01/09/2013 provides for a Maturity Date of December 1, 2019.
 - 6. Admitted.
 - 7. Admitted.

WHEREFORE, the Debtor respectfully requests that the Court enter the Order proposed by the Trustee, and for such other relief the Court deems equitable and just.

Date: 12/4/2020

s/ Robert S. Shreve
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